

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In Re:

Case No: 11-01093 SEK

**IRIS V MULERO RIVERA**

Chapter 13

Debtor(s)

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**MOTION TO INFORM AMENDED PLAN**

TO THE HONORABLE COURT:

**NOW COMES** the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to provide to pay Rent Express/ Mueblerias Berrios prior attorney fees.

**WHEREFORE**, it is respectfully requested to this Honorable Court to take notice of the aforementioned.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

**In San Juan, Puerto Rico this 3rd day of March of 2011.**

JPC LAW OFFICE

Jose M Prieto Carballo, Esq  
P.O. Box 363565  
San Juan, P.R. 00936-3565  
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By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court  
District of Puerto Rico**

IN RE:

Case No. 11-01093-13

MULERO RIVERA, IRIS V

Debtor(s)

Chapter 13

**AMENDED CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: \_\_\_\_\_

☒ AMENDED PLAN DATED: 3/03/2011

☐ PRE ☐ POST-CONFIRMATION

Filed by: ☒ Debtor ☐ Trustee ☐ Other

**I. PAYMENT PLAN SCHEDULE**

\$ 150.00 x 60 = \$ 9,000.00  
\$        x        = \$         
\$        x        = \$         
\$        x        = \$         
\$        x        = \$       

TOTAL: \$ 9,000.00

Additional Payments:

\$        to be paid as a LUMP SUM  
within        with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in  
addition to the above:

\$        x        = \$       

PROPOSED BASE: \$ 9,000.00

**III. ATTORNEY'S FEES  
(Treated as § 507 Priorities)**

Outstanding balance as per Rule 2016(b) Fee  
Disclosure Statement: \$ 2,794.00

Signed: /s/ IRIS V MULERO RIVERA  
Debtor

Joint Debtor

**II. DISBURSEMENT SCHEDULE**

A. ADEQUATE PROTECTION PAYMENTS OR        \$       

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. Usda Rur Dev Cr.        Cr.         
# 7249847 #        #         
\$ 1,800.00 \$        \$       

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. IRS Cr.        Cr.         
# 3470 #        #         
\$ 1,800.00 \$        \$       

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr.        Cr.        Cr.         
#        #        #         
\$        \$        \$       

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

Usda Rur Dev

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.  
11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other:         
☐ Paid 100% / ☐ Other:       

Cr.        Cr.        Cr.         
#        #        #         
\$        \$        \$       

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)

FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5).

ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330.

TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.

TRUSTEE SHALL PAY RENT EXPRESS/ EMPRESAS BERRIOS INTEREST PRIOR ATTORNEY FEES.

Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

Debtor(s)

**AMENDED CHAPTER 13 PAYMENT PLAN**  
Continuation Sheet - Page 1 of 1

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**Executory Contracts - Assumed:**

RENT EXPRESS/ MUEBLF

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 11-01093-13

MULERO RIVERA, IRIS V

Chapter 13

Debtor(s)

**AMENDED VERIFICATION OF CREDITOR MATRIX**

The above named debtor(s) hereby verify(ies) that the attached matrix listing creditors is true to the best of my(our) knowledge.

Date: March 3, 2011

Signature: /s/ IRIS V MULERO RIVERA  
IRIS V MULERO RIVERA

Debtor

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Joint Debtor, if any

AMENDED ADDRESS MASTER LIST

MULERO RIVERA, IRIS V  
3R29 CALLE 40  
ALTURAS DE BUCARABONES  
TOA ALTA, PR 00953

HOME DEPOT  
Po Box 6497  
Sioux Falls, SD 57117

Jose Prieto  
PO BOX 363565  
San Juan, PR 00936-3565

IRS  
P O BOX 21125  
PHILADELPHIA, PA 19114

Admin Recovery Llc  
5930 Main St  
Williamsville, NY 14221

JC PENNY  
MONARCH RCOVERY  
P O BOX 21089  
PHILADELPHIA, PA 19114-0589

ANDERSON CRENSHAW ASSO  
NORTH CENTRAL PLAZA II  
12801 N CENTRAL EXPRESS  
DALLAS, TX 75243-1716

Lvnv Funding Llc  
Po Box 740281  
Houston, TX 77274

Cach Llc  
4340 S Monaco St 2nd Flo  
Denver, CO 80237

ONELINK  
P O BOX 192296  
SAN JUAN, PR 00919-2296

CITI BANK  
SOUTH DAKOTA NA  
P O BOX 140310  
TOLEDO, OH 43614

RENT EXPRESS/ MUEBLRIAS BERRIOS  
P O Box 674  
Cidra, PR 00739

DEPT DE TRANSPORTACION  
Y OBRAS PUBLICAS  
P O BOX 41269  
SAN JUAN, PR 00940-1269

SECURITY CREDIT SERVICES, LLC  
5440 N CUMBERLAND AVE STE 300  
CHICAGO, IL 60656-1490

ECMC  
LOCK BOX 8639  
P O BOX 75848  
ST PAUL, MN 55175

TOYOTA CREDIT  
350 AVE FEDERICO COSTAS SUITE 500  
SAN JUAN, PR 00918

FIRST BANK  
P O BOX 9146  
SAN JUAN, PR 00908

Usda Rur Dev  
P.o. Box 66889  
Saint Louis, MO 63166

GROUP USA  
P O BOX 731  
Mahwah, NJ 07430

WALLMART  
PO BOX 981400  
EL PASO, TX 79998